

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking Regarding Policies,
Procedures and Rules for the California Solar
Initiative, the Self-Generation Incentive Program
and Other Distributed Generation Issues.

Rulemaking 08-03-008
(Filed March 13, 2008)

**SAN DIEGO GAS & ELECTRIC (U 902 M) POST-WORKSHOP COMMENTS
TO THE RULE 21 WORKING GROUP'S JUNE 20, 2008 WORKSHOP ON
THE RULE 21 WORKING GROUP**

Steven D. Patrick

Attorney for

SAN DIEGO GAS & ELECTRIC COMPANY

555 West Fifth Street, Suite 1400

Los Angeles, CA 90013-1011

Phone: (213) 244-2954

Fax: (213) 629-9620

E-Mail: spatrick@sempra.com

July 14, 2008

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking Regarding Policies,
Procedures and Rules for the California Solar
Initiative, the Self-Generation Incentive Program
and Other Distributed Generation Issues.

Rulemaking 08-03-008
(Filed March 13, 2008)

**SAN DIEGO GAS & ELECTRIC (U 902 M) POST-WORKSHOP COMMENTS
TO THE RULE 21 WORKING GROUP'S JUNE 20, 2008 WORKSHOP ON
THE RULE 21 WORKING GROUP**

I.

INTRODUCTION

San Diego Gas & Electric ("SDG&E") appreciates the opportunity to provide comments to the California Public Utilities Commission ("Commission") regarding the Rule 21 workshop held in San Francisco on June 20, 2008. SDG&E views the workshop as a positive first step toward the final transition of responsibilities of the working group from the California Energy Commission to the Commission.

The Rule 21 Working Group was originally established by the Commission for the purpose of developing a uniform electric Rule 21 among the California Investor Owned Utilities ("IOUs"). The intent of a uniform Rule 21 was to facilitate and streamline the interconnection process for small customer owned generators statewide. This goal was achieved in early 2001 when the IOUs filed the first version of the "new" Rule 21. Since 2001 the Rule has undergone additional revisions as a result of various refinements.

Because the current “new” Rule 21 has greatly improved and streamlined the interconnection process in the state, SDG&E believes the Rule 21 Working Group has achieved its intended mission and further development is no longer required. However, SDG&E recognizes the considerable amount of time and effort it took to reach the current form of Rule 21. Accordingly, SDG&E believes that it is important that the Commission continue to maintain the uniformity of Rule 21. For that reason, SDG&E recommends that the status of the current working group be modified from a “development working group,” that meets on a regular basis, to a “maintenance working group” that would meet efficiently twice yearly to monitor uniformity and address new issues and developments (e.g., changes to the Commission pre-approved Forms.)

SDG&E considers defining the role and the structure of a maintenance working group as a high priority for the Commission to address. SDG&E encourages the establishment of a maintenance working group as soon as practicable in order to address the open issues presented at the workshop. SDG&E recommends that this working group could be modeled similarly to the SGIP working group with the IOUs having representatives at each meeting. Likewise, the Commission would designate its own representatives. Like the SGIP WG, the membership should be limited to those who are directly involved in the implementation (of Rule 21, in this case, it would be the IOUs and the CPUC) for the sake of expediency. Meetings should be documented so there is accurate history available and issues already dealt with are not circled back to many times over unnecessarily, or without the agreement of the WG members.

The other open policy issue SDG&E believes still requires attention is the issue of consolidating the numerous overlapping DG reports circulated among the working group members that can be redundant, inconsistent or overburdensome (at times simultaneously) This

item was discussed in the past, eventually suspended until further notice and has remained in that stalled status. Although reporting is not directly an interconnection issue, it did – and still does – affect those dealing with reports related to Rule 21. For that reason, SDG&E considers this a valid issue that should be resolved.

Regarding the remaining policy Issues mentioned in the paper circulated by the Energy Division to the Rule 21 Working Group members, those appear to be new (not having been presented to the working group prior to the June 20 meeting) and do not appear to have a direct relevance to Rule 21 interconnection procedures. Accordingly, SDG&E believes that these are not issues that the Rule 21 Working Group should address.

Regarding the noted technical issues in the list of issues circulated to the Working Group, SDG&E supports the development of work completed under IEEE 1547.1 (Conformance Testing) for consideration under Rule 21, and agrees that the Interconnection Application Form should be updated. Of the remaining Technical Issues in the matrix, the last item, regarding Certification, is a key issue since manufacturers will continue to solicit certification status for new systems. A Certification Committee was developed within the Rule 21 Working Group, chaired by BEW Engineering, which met to provide an evaluation of certification requests. At this point, it is not clear how certification requests are currently being handled.

When technical issues are to be considered, it is strongly recommended that technical resources be added to allow proper vetting of technical issues. This need was satisfied by BEW Engineering in the CEC Rule 21 Working Group process, and this played a critical role in the effective development of the technical sections of Rule 21. It is critical to maintain an understanding of technical discussions and decisions that have taken place in past working group meetings in the crafting of the current Rule 21 before considering revisions.

This concludes SDG&E's comments.

Respectfully submitted,

By: /s/ Steven D. Patrick
Steven D. Patrick

Attorney for

SAN DIEGO GAS & ELECTRIC COMPANY

555 West Fifth Street, Suite 1400

Los Angeles, CA 90013-1011

Phone: (213) 244-2954

Fax: (213) 629-9620

E-Mail: spatrick@sempra.com

July 14, 2008

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing **SAN DIEGO GAS & ELECTRIC COMPANY (U 902 M) POST-WORKSHOP COMMENTS TO THE RULE 21 WORKING GROUP'S JUNE 20, 2008 WORKSHOP ON THE RULE 21 WORKING GROUP** on all known interested parties of record in **R.08-03-008** by electronic mail. Any party on the service list who has not provided an electronic mail address was served by placing copies in properly addressed sealed envelopes and depositing such envelopes in the United States Mail with first-class postage prepaid.

Copies were also sent via Federal Express to Administrative Law Judge Dorothy Duda, Administrative Law Judge Maryam Ebke and Commissioner Michael Peevey.

Dated at Los Angeles, California this 14th day of July, 2008.

/s/ Marivel Munoz
Marivel Munoz

CALIFORNIA PUBLIC UTILITIES COMMISSION;
Service Lists - Proceeding: R0803008; Last Updated: July 11, 2008;

donauldgilligan@comcast.net; david.kopans@fatspaniel.com; Michael.Brown@utcpower.com;
steven.huhman@morganstanley.com; spatrick@sempra.com; scfarms@socal.rr.com; annette.gilliam@sce.com;
scott@debenhamenergy.com; mcalabrese@sandiego.gov; liddell@energyattorney.com;
andrew.mcallister@energycenter.org; kirk@NoElectricBill.com; thunt@cecmail.org; thunt@cecmail.org;
pepper@sunfundcorp.com; susanne@emersonenvironmental.com; marcel@turn.org; cec@cpuc.ca.gov;
stephen.morrison@sfgov.org; matt@sustainablespace.com; jsomers@lisc.org; nes@a-klaw.com;
craig.lewis@greenvolts.com; abrowning@votesolar.org; skoffman@powernab.com; enriqueg@lif.org;
jkarp@winston.com; mday@goodinmacbride.com; rjl9@pge.com; ssmyers@att.net; bill@brocksolarenergy.com;
info@calseia.org; nehemiah.stone@us.kema.com; rknight@bki.com; emackie@gridalternatives.org;
jharris@volkerlaw.com; kfox@keyesandfox.com; gsmorris@emf.net; thaliag@greenlining.org;
john@proctoreng.com; sebesq@comcast.net; julie.blunden@sunpowercorp.com; michaelkyes@sbcglobal.net;
elee@davisenergy.com; mkober@pyramidsolar.com; lmh@eslawfirm.com; pstoner@lgc.org;
atrowbridge@daycartermurphy.com; ensmith@mwe.com; mdorn@mwe.com; kdubin@mwe.com;
myuffee@mwe.com; jimross@r-c-s-inc.com; ghinners@reliant.com; bhao@simmonsco-intl.com;
jrohrbach@reliant.com; kbosley@bear.com; ptramonte@bear.com; phammond@simmonsco-intl.com;
rhanna@reliant.com; bbaker@summitblue.com; tim_merrigan@nrel.gov; robert.pettinato@ladwp.com;
HYao@SempraUtilities.com; asteele@hanmor.com; npedersen@hanmor.com; socal.forum@yahoo.com;
susan.munves@smgov.net; tbardacke@globalgreen.org; eklinkner@ci.pasadena.ca.us;
steve@energyinnovations.com; rzhang@cityofpasadena.net; sendo@ci.pasadena.ca.us;
jrathke@capstoneturbine.com; thamilton@icfi.com; bjeider@ci.burbank.ca.us; MtenEyck@ci.rancho-
cucamonga.ca.us; akbar.jazayeri@sce.com; case.admin@sce.com; james.lehrer@sce.com; mike.montoya@sce.com;
Robert.F.LeMoine@sce.com; rishii@aesc-inc.com; dan@energysmarthomes.net; fortlieb@sandiego.gov;
annie.henderson@energycenter.org; irene.stillings@energycenter.org; jennifer.porter@energycenter.org;
john.sup@energycenter.org; jon.bonk-vasko@energycenter.org; jyamagata@semprautilities.com;
sephra.ninow@energycenter.org; cmanson@semprautilities.com; elee@sandiego.gov; tblair@sandiego.gov;
bob.ramirez@itron.com; jmgarber@iid.com; ctoca@utility-savings.com; jcox@fce.com; karambelas@fce.com;
hgreen@sunedison.com; sbarata@opiniondynamics.com; gdehart@anaheim.net; ssciortino@anaheim.net;
warehouse@mohrpower.com; m.stout@cleantechamerica.com; guliassi@sunfundcorp.com;
jrichman@bloomenergy.com; fsmith@sfwater.org; jack@penfund.net; filings@a-klaw.com;
Nick.Allen@morganstanley.com; nzigelbaum@nrdc.org; sean.hazlett@morganstanley.com; CJSv@pge.com;
CABe@pge.com; er@suntechamerica.com; KMPa@pge.com; SGraham@navigantconsulting.com;
spauker@wsgr.com; sww9@pge.com; pvalen@thelen.com; croaman@ccsf.edu; steven@moss.net;
bcragg@goodinmacbride.com; jwiedman@goodinmacbride.com; cem@newsdata.com; C2M1@pge.com;
bawilkins@sbcglobal.net; sara@solaralliance.org; ronnie@energyrecommerce.com; cp@kacosolar.com;
AXY4@pge.com; S2B9@pge.com; CLHs@pge.com; jwwd@pge.com; grant.kolling@cityofpaloalto.org;
jordan@tiogaenergy.com; paul@tiogaenergy.com; rguild@solarcity.com; Shoeless838@comcast.net;
JMCLA@comcast.net; jchamberlin@strategicenergy.com; seawayland@comcast.net; sbeserra@sbcglobal.net;
kbest@realenergy.com; jlarkin@us.kema.com; nellie.tong@us.kema.com; karin.corfee@kema.com;
JerryL@abag.ca.gov; jody_london_consulting@earthlink.net; faisal@gridalternatives.org;
zfranklin@gridalternatives.org; mrw@mrwassoc.com; gteigen@rcmdigesters.com; taram@greenlining.org;
jlin@strategen.com; tomb@crossborderenergy.com; heidi@sunlightandpower.com; elvine@lbl.gov;
rhwisner@lbl.gov; tdfeder@lbl.gov; justin@sunwatersolar.com; jna@speakeasy.org;
joelene.monestier@spgsolar.com; mary.tucker@sanjoseca.gov; njfolly@tid.org; fwmonier@tid.org;
preston@sonomaenergymgt.com; brbarkovich@earthlink.net; lmerry@vervesolar.com; rmccann@umich.edu;
kenneth.swain@navigantconsulting.com; karly@solardevelop.com; abb@eslawfirm.com; jjg@eslawfirm.com;
glw@eslawfirm.com; dchong@energy.state.ca.us; h.dowling@suntechnics.com; eyhecox@stoel.com;
jmcFarland@treasurer.ca.gov; jamckinsey@stoel.com; kellie.smith@sen.ca.gov; laurene_park@sbcglobal.net;
rberke@csd.ca.gov; bernardo@braunlegal.com; mdavis@barnumcelillo.com; chuck@csolt.net; karen@klindh.com;
jbarnet@smud.org; rhuang@smud.org; sfrantz@smud.org; whughes@smud.org; michael@awish.net;
brenda.latter@itron.com; george.simons@itron.com; Kurt.Scheuermann@itron.com; matt.summers@itron.com;
patrick.lilly@itron.com; arr@cpuc.ca.gov; aes@cpuc.ca.gov; css@cpuc.ca.gov; dot@cpuc.ca.gov;
eah@cpuc.ca.gov; jxm@cpuc.ca.gov; cln@cpuc.ca.gov; jf2@cpuc.ca.gov; kar@cpuc.ca.gov; lp1@cpuc.ca.gov;

meb@cpuc.ca.gov; mvc@cpuc.ca.gov; mts@cpuc.ca.gov; mc3@cpuc.ca.gov; nlc@cpuc.ca.gov; rl4@cpuc.ca.gov;
sco@cpuc.ca.gov; tcr@cpuc.ca.gov; Corlando@energy.state.ca.us; dvidaver@energy.state.ca.us;
dbeck@energy.state.ca.us; deden@energy.state.ca.us; dks@cpuc.ca.gov; lesterno@energy.state.ca.us;
mdoughto@energy.state.ca.us; smiller@energy.state.ca.us; Sgupta@energy.state.ca.us;
rbaybaya@energy.state.ca.us; mulloa@sempraulilities.com; marywong@sempaulilities.com; luluw@newsdata.com;
centralfiles@sempraulilities.com; mmunoz@sempra.com

Tom Ekhart
CAL-UCONS
10612 NE 46th Street
Kirkland, WA 98033

Melissa Jones
Executive Director
CALIFORNIA ENERGY COMMISSION
1516 9th Street, MS-39
Sacramento, CA 95814